

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

(Jointly Administered)

Re: Doc. No. 760

**REQUEST OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR TELEPHONIC STATUS CONFERENCE**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 cases of Mercy Hospital, Iowa City, Iowa (the “Hospital”) and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) submits this request (the “Request”) for a status conference with the Court in response to the *Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* [Docket No. 760] (the “Joint Disclosure Statement and Plan”) filed by the Debtors, and respectfully states as follows:

On February 23, 2024, the Debtors filed the Joint Disclosure Statement and Plan, which the Committee understands is supported by Preston Hollow Community Capital, Inc., as Bondholder Representative, and Computershare Trust Company, N.A., as Master Trustee. The Joint Disclosure Statement and Plan was filed with the Court without significant discussion and negotiation with the Committee.

Without significant negotiation and discussion among the various stakeholders in these chapter 11 cases, the plan confirmation process will be mired by significant litigation and the Debtors and their estates will incur substantial professional fees in connection therewith. In an effort to avoid significant litigation and unnecessary and costly expense relating to the Joint Disclosure Statement and Plan, the Committee requests that the Court schedule a status conference to discuss if alternative dispute resolution procedures can be established in connection with the Joint Disclosure Statement and Plan. The Committee believes that

implementation of such alternative dispute resolution procedures would greatly benefit the Debtors and their estates by reducing the professional fees that would be incurred in a contested plan confirmation process. The Committee understands that a preliminary request to be heard is presented and, to the extent that fees can be reduced, respectfully submits that the status conference be held telephonically.

WHEREFORE, for the foregoing reasons, the Committee respectfully requests that the Court schedule a status conference in relation to the Joint Disclosure Statement and Plan at its earliest convenience.

Dated: February 28, 2024

Respectfully submitted,

/s/ Andrew H. Sherman

Andrew H. Sherman, NJS Bar No. 042731991
(admitted *pro hac vice*)

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*Attorneys for The Official Committee of Unsecured
Creditors of Mercy Hospital, Iowa City, Iowa, et al.*

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2024, the foregoing instrument was filed electronically with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered users party to this proceeding.

/s/ Robert C. Gainer